CARGILL SALT DIVISION

916 S. Riverside Ave. St. Clair, MI 48079-5335 810/326-2700

June 30, 1999

Dermott Courtney Underground Injection Control Section U. S. Environmental Protection Agency Region 2 290 Broadway New York, New York 10007-1866

Ref: UIC Permit NYU105431 - MIT Reports

Dear Mr. Courtney:

Water-brine interface tests were conducted on three wells, designated 13, 14, and 16, at our Watkins Glen brinefield to demonstrate mechanical integrity in accordance with the subject permit during the past week. All three tests were successful, and the wells have been returned to solution mining service. Reports on the tests are enclosed.

Please call me at 810-326-2762 if you would like additional information, or fax to 810-329-3328.

Sincerely,

Michael J. Schumacher Solution Mining Manager

enclosures

cc: R. Nemecek, NYDEC

G. Meyer

99 JUL -9 ANH: 15

CARGILL INCORPORATED WATER-BRINE INTERFACE MECHANICAL INTEGRITY TEST REPORT

Address

Cargill Salt Watkins Glen Plant 518 E. 4th Street Watkins Glen , New York 14891 (607) 535-6300

General Information

UIC Permit NYU105431

Field Watkins Glen

Test well 13

Reference well 16

Other wells in gallery 14

Test well location Lat. 42°-23'-05", Long. 76°-51'-46"

Watkins Glen, New York

API No. **31-097-61212**

Test Date 28-Jun-99

Test fluid Water

Result PASSED TEST

Test well data

Well no.	13		
Depth of surface casing	955 ft	t.	Drilling record
Depth to top of salt formation	1743 ft	t.	9/96 gamma ray log
Depth to top of cavern	1824 ft	t.	10/96 Sonar caliper
Depth of production casing	1864 ft	t.	10/96 Sonar caliper
Depth of tubing (if present)	none ft	t.	
Total depth	2156 ft	t.	10/96 Sonar caliper
Original total depth	2672 ft	t.	Drilling record
Outer diameter of production casing	7 ir	n.	Drilling record
Outer diameter of tubing (if present)	none ir	n.	
Capacity of casing or annulus	1.607 g	gpf	
Volume of casing or annulus	2995 g	gals.	
Normal operating pressure	30 p	sig	
Mode of last 24 hours of operation	Brine production	n ¯	
All depths referenced to wellhead, el	ev. 453		

Reference well data

Well no.	16	
Depth of surface casing	1099 ft.	Drilling record
Depth to top of salt formation	1740 ft.	9/96 gamma ray log
Depth to top of cavern	1790 ft.	10/96 Sonar caliper
Depth of production casing	1878 ft.	10/96 Sonar caliper
Depth of tubing (if present)	none ft.	
Total depth	2174 ft.	10/96 Sonar caliper
Original total depth	2694 ft.	Drilling record
Outer diameter of production casing	7 in.	Drilling record
Outer diameter of tubing (if present)	none in.	
Capacity of casing or tubing	1.607 gpf	
Volume of casing or tubing	3018 gals.	
All depths referenced to wellhead, ele-	v. 453	

Target Depth for Interface

Normally 50 feet above the end of the casing or the cavern roof, whichever is shallower

Depth **1774** ft.

Instrumentation

Well	Test	Reference
Manufacturer	Paroscientific	Paroscientific
Model	760-1K	760-1K
Serial No.	42953	42954
Accuracy	0.01%	0.01%
Precision	0.001 psi	0.001 psi

Preparation

If the casing of the test well was most recently used for brine production, flush with water to remove any crystallized salt.

Date and time test well was flushed 06/21/99

Approximate volume in gallons 10,000

Shut-in period with water in casing 16 hours

Comments

Second date and time well was flushed

Approximate volume in gallons

Shut-in period with water in casing

Comments

The test well must be bled back to ensure that it is filled with a fluid of uniform density. Bleed back at least the volume of the casing or annulus.

Date test well was bled back 06/22/99

Approximate volume in gallons 10,000

Specific gravity of fluid 1.205

Comments A slip blind was placed in the surface piping after the well was

bled back to prevent leakage out of the wellhead.

The reference well must be bled back to ensure that it is filled with a fluid of uniform density. Bleed back at least the volume of the tubing or casing.

Date and time ref well was bled back 06/25/99

Approximate volume in gallons 3,000

Specific gravity of fluid 1.197

Comments A slip blind was placed in the surface piping

to prevent leakage out of the wellhead.

Set Interface

Test fluid	Water
Specific gravity of test fluid	1.000
Specific gravity of brine	1.205

Calculate maximum permissible injection rate and target pressure differential.

Capacity of casing	Allowable	Maximum inj.
or annulus	velocity	rate
1.607 gpf x	20 fpm =	32 gpm

Target interface depth x gradient diff. = target pressure diff. 1774 ft. x (1.205 - 1.000) X 0.433 = 157.5 psi

Date	06/26/99					change
		Time	Test Well	Ref. Well	Diff.	in diff.
Pressures before	injection	08:00	50.819	57.014	-6.195	
Pressures during	injection	10:20	150.096	58.617	91.479	97.674
Pressures during	injection	12:45	198.890	59.360	139.530	145.725
Pressures after in	jection	13:05	212.016	59.624	152.392	158.587

All pressures measured in psia

Calculated final interface depth

 $158.587 \text{ psi} / ((1.205 - 1.000) \times 0.433) = 1787 \text{ ft.}$

Note: Volume of injected fluid was not measured.

Temperature Stabilization Period

Start Stabilization	Date	Time	Test Well	Ref. Well	Diff.	change
	06/26	13:05	212.016	59.624	152.392	in diff.
Start of test Total time (Minimum time is 36	06/28 hours.)	07:00 41 hr	210.724 rs.	59.461	151.263	-1.129

The observed change in differential pressure does not indicate significant interface movement during this period.

Test Period

						change
	Date	Time	Test Well	Ref. Well	Diff.	in diff.
Start of test	06/28	07:00	210.724	59.461	151.263	
Inter. press	06/28	09:00	210.655	59.411	151.244	-0.019
Inter. press	06/28	11:00	210.483	59.432	151.051	-0.212
Inter press	06/28	13:00	210.409	59.457	150.953	-0.311
End test	06/28	15:00	210.309	59.401	150.908	-0.355

Test Period 8 hrs
Average pressure change -0.044 psi/hr

Maximum allowable pressure change is 0.05 psi/hr over 8 hours.

If the test was conducted in accordance with the method approved in the USEPA notice published in the Federal Register of August 18,1989, page 34169-34171 (as amended in Federal Register of November 14, 1989, page 47451) and the rate of pressure change during the test period was less than 0.05 psi/hour, the well has passed the test and demonstrated internal mechanical integrity.

Result:

PASSED TEST

Comments

Test and reference well pressures were read simultaneously during the eight-hour test period.

Person conducting test:

Craig Kelly

Production Supervisor

Cargill Salt 518 E. 4th St.

Watkins Gien, NY 14891

Witnessing field personnel:

None

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for the submission of false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner/authorized agent :

Michael J. Schumacher Solution mining manager Cargill Salt 916 S. Riverside Ave. St. Clair, MI 48079 (810) 326-2762

Attachments:

Field data sheets (1)
Gauge calibration certificates

FIELD DATA SHEET

INSTRUMENT S/N 42953

INSTRUMENT S/N 42954

DATE	TIME	TEST PRESS.	REF PRESS.	DIFFERENCE	OPER. INIT.	REMARKS
6/26/99	08:00	50,8192	57.0138	-6-195	ms	
1 /	10:20	150,096	58-6172	81.479	night	START PUMPING 8:35
	12:45	198.890	59.3602	139,530	Told	
	13:00					COMPLETE PUMPING
	13:05	212.016	59.6238	152.393-	mal	
6/28	07:00	210.724	59.4606	151.2634	CR	Started test
6 28	09:00	210.655	59.4106	151.2444	CK	
6/28	11:00	210.483	59.4317	151.0513	CK	
6/28	1:00	210.409	59.4565	150.9525	CK	
6/28	3:00	210.309	59.4012	150.9078	CK	
		The sales	N. M. Berry	Y. The		
		210-				

PAROSCIENTIFIC, INC. 4500 148th Ave. N.E. Redmond, WA 98052 Tel: (206) 883-8700 Fax: (206) 867-5407

Customer:

CARGILL SALT

916 S. RIVERSIDE AVE. ATTN: MIKE SCHUMACHER ST. CLAIR, MI 48079

Date:

. 01-13-1998

Sales Order: 13745

STATUS REPORT OF INTELLIGENT TRANSMITTER

Serial Number: 42953 Model: 760-1K

Pressure Range: 0 to 1000 psia oil filled Port:

Configuration ______

Calibration Coefficients

VR: 60.05 SN: 42953 ID: 01

PA: .0085780 PM: 1.000791 TC: .6890874

BR: 9600 PT: N

U0: 5.851211 Y1: -3983.023 Y2: -12112.38

DP: 6

Y3: -78361.29

MD: 1

C1: -4132.251 C2: -206.1299

MC: Y

C3: 11047.71

UN: 1 UF: 1.000000

D1: .0609788 D2: .0000000

PR: 00238 TR: 00952

> T1: 29.95307 T2: .0023395

OP: 1050.000 ZS: 0

T3: 41.01313 T4: 17.56322 T5: 564.0273

ZV: 17.76171

4500 148th Avenue N. E. Redmond, WA 98052-5194

Redmond, WA 98052-5194 Telephone: (425) 883-8700 Facsimile: (425) 867-5407

Email: salessupport@paroscientific.com Internet: http://www.paroscientific.com

CERTIFICATE OF CALIBRATION

TRANSDUCER MODEL: 760-1K

SERIAL NUMBER: 42953

The Paroscientific transducer(s) identified above has been calibrated and tested with one or more of the following primary pressure standards. All have traceability to the National Institute of Standards and Technology.

Bell and Howell Primary Pressure Standard

Pneumatic Absolute or Gauge Dead Weight Tester Part Number: 6-201-0001, S/N 4034 and S/N 1014

Piston/Cylinder: 6-001-0002, P2-919/C2-1523, Weight Set 1: 6-002-0002

Range: 1.5 to 50 psi [10 to 345 kPa] Accuracy: 0.010 percent of reading

Piston/Cylinder: 6-001-0002, P2-652/C2-1378, Weight Set 2: 6-002-0002

Range: 1.5 to 50 psi [10 to 345 kPa] Accuracy: 0.010 percent of reading

Piston/Cylinder: 6-001-0001, P1-949/C1-922, Weight Set 2: 6-002-0002

Range: 0.3 to 5 psi [2 to 34 kPa] Accuracy: 0.015 percent of reading

DH Primary Pressure Standard

Pneumatic Absolute or Gauge Dead Weight Tester

Part Number: PG7601 S/N 161

Piston/Cylinder: S/N 305, Mass Set: S/N 2052

Range: 0.7 to 50 psi [5 to 345 kPa] absolute mode, 0.29 to 50 psi [2 to 345 kPa] gauge mode

Accuracy: 0.002 percent of reading

DH Primary Pressure Standard

Pneumatic Gauge Dead Weight Tester, Model 5203, S/N 5557

Piston/Cylinder: S/N 4845, Mass Sets: S/N 2032, S/N 3293

Range: 20 to 1,600 psi [0.14 to 11 MPa] Accuracy: 0.005 percent of reading

DH Primary Pressure Standard

Oil Operated Gauge Dead Weight Tester, Model 5306, S/N 3505

Piston/Cylinder: S/N 3375, Mass Set: S/N 2032 Range: 40 to 20.000 psi [0.3 to 138 MPa]

Accuracy: 0.01 percent of reading above 200 psi [1.4 MPa]

or 0.02 psi [0.14 kPa] at lower pressure

Piston/Cylinder: S/N 3511, Mass Set: S/N 2032

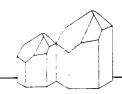
Range: 145 to 72,500 psi [1 to 500 MPa]

Accuracy: 0.02 percent of reading above 725 psi [5 MPa]

or 0.145 psi [1 kPal at lower pressure

Tested By: Document No. 8145-001, Rev. F 10/17/97

Date: 1-14-98



4500 148th Avenue N. E. Redmond, WA 98052-5194 Telephone: (425) 883-8700

Facsimile: (425) 867-5407 Email: salessupport@paroscientific.com Internet: http://www.paroscientific.com

CERTIFICATE OF CONFORMANCE

CUSTOMER:	CARGILL SALT
PURCHASE ORDER:	S6163
TRANSDUCER MODEL:	760-1K
PART NUMBER:	1107-047-0
SERIAL NUMBER(S):	42953

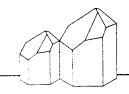
PAROSCIENTIFIC INCORPORATED certifies that the part(s) identified above complies with the requirements of the above order and has been manufactured in accordance with engineering drawings, material and process specifications, testing procedures, and applicable specification drawing of Paroscientific Incorporated. The transducer(s) identified has been calibrated and tested over the specified pressure and temperature range and meets the requirements of the applicable specification drawing. Primary pressure standards and transfer standards used at Paroscientific Incorporated for calibration and testing have traceability to the National Institute of Standards and Technology and are regularly checked and calibrated according to Paroscientific QA Procedure Q8521, Inspection Test and Measurement Equipment, in accordance with the requirements of ISO 9001.

- Elle (

<u>1/14/98</u>

AUTHORIZED SIGNATURE Steve Winters, Quality Assurance Manager

DATE



4500 148th Avenue N. E. Redmond, WA 98052-5194 Telephone: (425) 883-8700

Facsimile: (425) 867-5407 Email: salessupport@paroscientific.com Internet: http://www.paroscientific.com

CERTIFICATION OF TRACEABILITY TO NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY

Primary pressure standards used in the calibration and testing of Paroscientific pressure transducers have traceability to the National Institute of Standards and Technology through the following documentation.

Bell and Howell Primary Pressure Standard:

Bell and Howell, Model 6-201-0001, Piston/Cylinder P2-919/C2-1523 via DH Calibration Report No. 14480, traceable to NIST via test report numbers TN-249770-92, TN-250722-92, TN-251820-93, MS17/MS23. Weight Set 1, P/N 6-002-0002, via DH Calibration Report No. 14481, traceable to NIST. Weight Set 2, P/N 6-002-0002, via DH Calibration Report No. 14576, traceable to NIST. Piston/Cylinder P2-652/C2-1378 via DH Instruments Calibration Report No. 14575, traceable to NIST. Piston/Cylinder P1-231/C1-384 via DH Instruments Calibration Report No. 13170, traceable to NIST. Piston/Cylinder P/N 6-201, No. P1/949/C1-922, via DH Instruments Calibration Report 14680, traceable to NIST via test reports M1212, TN-251820-93 and 822/255136-95.

DH Primary Pressure Standard, Oil Operated Gauge:

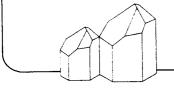
DH Instruments, Model 5306, Piston/Cylinder S/N 3375, via DH Calibration Certificate No. 6167 via National Bureau of Standards Reports TN-251820, TN-250722-92, TN-246108-90 and MS17/MS23. Piston/Cylinder 3511 via DH Calibration Certificate No. 1377 and via NIST reports TN-243399-89, T/N-244408-89, TN-240898, 731/243089, and 523/242160.

DH Primary Pressure Standard, Pneumatic Operated Gauge:

DH Instruments, Model 5203, Piston/Cylinder S/N 4845, via DH Calibration Certificate No.4473, via National Bureau of Standards Reports TN-249770-92, TN-250722-92, TN-251820-93, and MS 17/MS23. Mass Set S/N 2032/3293 via DH Calibration Certificate Nos.1029, 1030, 1932, 2871 and via National Bureau of Standards Reports 731/236729-86, SP-8099, P-8218X, 737/23584, 523/242160, TN-249770-92, TN-250722-92, TN-246108-90, and MS 17/MS 23.

DH Primary Pressure Standard, Pneumatic Operated Gauge:

DH instruments, Model PG7601, Piston/Cylinder S/N 305 via DH Instruments Calibration No. 7168, traceable to NIST via test reports M1212, TN-251820-93 and 822/255136-95. DH Instruments 35 Kg Mass Set No. 2052 via DH Instruments Calibration Report No. 7210, via traceable to NIST via test reports M1212, TN-251820-93 and 822/255136-95.



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CARGILL SALT

916 S. RIVERSIDE AVE. ATTN: MIKE SCHUMACHER ST. CLAIR, MI 48079

Date:

01-14-1998

Sales Order:

13745

STATUS REPORT OF INTELLIGENT TRANSMITTER

Serial Number: 42954 Model: 760-1K

Pressure Range: 0 to 1000 psia

Port:

oil filled

Configuration Calibration Coefficients

VR: 60.05 PA: -.0261310 SN: 42954 PM: 1.000610 ID: 01 TC: .6890862 BR: 9600 PT: N U0: 5.875855

Y1: -3967.729 DP: 6 Y2: -11899.68 Y3: -77682.61

UF: 1.000000
PR: 00238
TR: 00952
D1: .0585815
D2: .0000000

OP: 1100.000 T1: 30.13561
ZS: 0 T2: 1.100547
ZV: .0000000 T3: 42.60255
T4: 25.11160

T5: 774.7579

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CERTIFICATE OF CALIBRATION

TRANSDUCER MODEL: 760-1K

SERIAL NUMBER: 42954

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Bell and Howell Primary Pressure Standard

Pneumatic Absolute or Gauge Dead Weight Tester Part Number: 6-201-0001, S/N 4034 and S/N 1014

Piston/Cylinder: 6-001-0002, P2-919/C2-1523, Weight Set 1: 6-002-0002

Range: 1.5 to 50 psi [10 to 345 kPa] Accuracy: 0.010 percent of reading

Piston/Cylinder: 6-001-0002, P2-652/C2-1378, Weight Set 2: 6-002-0002

Range: 1.5 to 50 psi [10 to 345 kPa] Accuracy: 0.010 percent of reading

Piston/Cylinder: 6-001-0001, P1-949/C1-922, Weight Set 2: 6-002-0002

Range: 0.3 to 5 psi [2 to 34 kPa] Accuracy: 0.015 percent of reading

DH Primary Pressure Standard

Pneumatic Absolute or Gauge Dead Weight Tester

Part Number: PG7601 S/N 161

Piston/Cylinder: S/N 305, Mass Set: S/N 2052

Range: 0.7 to 50 psi [5 to 345 kPa] absolute mode, 0.29 to 50 psi [2 to 345 kPa] gauge mode

Accuracy: 0.002 percent of reading

DH Primary Pressure Standard

Pneumatic Gauge Dead Weight Tester, Model 5203, S/N 5557

Piston/Cylinder: S/N 4845, Mass Sets: S/N 2032, S/N 3293

Range: 20 to 1,600 psi [0.14 to 11 MPa] Accuracy: 0.005 percent of reading

DH Primary Pressure Standard

Oil Operated Gauge Dead Weight Tester, Model 5306, S/N 3505

Piston/Cylinder: S/N 3375, Mass Set: S/N 2032 Range: 40 to 20,000 psi [0.3 to 138 MPa]

Accuracy: 0.01 percent of reading above 200 psi [1.4 MPa]

or 0.02 psi [0.14 kPa] at lower pressure

Piston/Cylinder: S/N 3511, Mass Set: S/N 2032

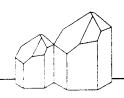
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Accuracy: 0.02 percent of reading above 725 psi [5 MPa]

or 0.145 psi [] kPa] at lower pressure

Date: 1-14-98

Document No. 8145-001. Rev. F



Digiquartz® Pressure Instrumentation

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Facsimile: (425) 867-5407 Email: salessupport@paroscientific.com Internet: http://www.paroscientific.com

CERTIFICATE OF CONFORMANCE

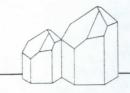
CUSTOMER:	CARGILL SALT
PURCHASE ORDER:	S6163
TRANSDUCER MODEL:	760-1K
PART NUMBER:	1107-047-0
SERIAL NUMBER(S):	42954

PAROSCIENTIFIC INCORPORATED certifies that the part(s) identified above complies with the requirements of the above order and has been manufactured in accordance with engineering drawings, material and process specifications, testing procedures, and applicable specification drawing of Paroscientific Incorporated. The transducer(s) identified has been calibrated and tested over the specified pressure and temperature range and meets the requirements of the applicable specification drawing. Primary pressure standards and transfer standards used at Paroscientific Incorporated for calibration and testing have traceability to the National Institute of Standards and Technology and are regularly checked and calibrated according to Paroscientific QA Procedure Q8521, Inspection Test and Measurement Equipment, in accordance with the requirements of ISO 9001.

AUTHORIZED SIGNATURE

Steve Winters, Quality Assurance Manager

1/14/98 DATE



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Bell and Howell Primary Pressure Standard:

Bell and Howell, Model 6-201-0001, Piston/Cylinder P2-919/C2-1523 via DH Calibration Report No. 14480, traceable to NIST via test report numbers TN-249770-92, TN-250722-92, TN-251820-93, MS17/MS23. Weight Set 1, P/N 6-002-0002, via DH Calibration Report No. 14481, traceable to NIST. Weight Set 2, P/N 6-002-0002, via DH Calibration Report No. 14576, traceable to NIST. Piston/Cylinder P2-652/C2-1378 via DH Instruments Calibration Report No. 14575, traceable to NIST. Piston/Cylinder P1-231/C1-384 via DH Instruments Calibration Report No. 13170, traceable to NIST. Piston/Cylinder P/N 6-201, No. P1/949/C1-922, via DH Instruments Calibration Report 14680, traceable to NIST via test reports M1212, TN-251820-93 and 822/255136-95.

DH Primary Pressure Standard, Oil Operated Gauge:

DH Instruments, Model 5306, Piston/Cylinder S/N 3375, via DH Calibration Certificate No. 6167 via National Bureau of Standards Reports TN-251820, TN-250722-92, TN-246108-90 and MS17/MS23. Piston/Cylinder 3511 via DH Calibration Certificate No. 1377 and via NIST reports TN-243399-89, T/N-244408-89, TN-240898, 731/243089, and 523/242160.

DH Primary Pressure Standard, Pneumatic Operated Gauge:

DH Instruments, Model 5203, Piston/Cylinder S/N 4845, via DH Calibration Certificate No.4473, via National Bureau of Standards Reports TN-249770-92, TN-250722-92, TN-251820-93, and MS 17/MS23. Mass Set S/N 2032/3293 via DH Calibration Certificate Nos.1029, 1030, 1932, 2871 and via National Bureau of Standards Reports 731/236729-86, SP-8099, P-8218X, 737/23584, 523/242160, TN-249770-92, TN-250722-92, TN-246108-90, and MS 17/MS 23.

DH Primary Pressure Standard, Pneumatic Operated Gauge:

DH instruments, Model PG7601, Piston/Cylinder S/N 305 via DH Instruments Calibration No. 7168, traceable to NIST via test reports M1212, TN-251820-93 and 822/255136-95. DH Instruments 35 Kg Mass Set No. 2052 via DH Instruments Calibration Report No. 7210, via traceable to NIST via test reports M1212, TN-251820-93 and 822/255136-95.

